

FACT SHEET

December 1, 2008

Applicant: Mr. Harry Garsee, Plant Manager
City of Natchitoches – City of Natchitoches Wastewater Plant
P.O. Box 37
Natchitoches, Louisiana 71457

AI Number: AI 38060
Permit No.: LASS038060
TEMPO ID#: PER20080001

Application Type: Sewage Sludge & Biosolids Use or Disposal Permit Application
Natchitoches Parish

Permit Action:

Draft Sewage Sludge & Biosolids Use or Disposal Permit

Sewage Sludge Preparation Process:

Belt Press/Solidification & De-watering at its POTW located at 900 Laird Fletcher Road, Natchitoches, Natchitoches Parish Louisiana.

Sewage Sludge & Biosolids Use or Disposal Option:

Disposal in a Municipal Solid Waste Landfill (MSWL) – IESI LaSalle/Grant Landfill

Pertinent Information:

October 17, 2002: The city of Natchitoches was issued a Solid Waste Beneficial Use Permit, P-0359. Therefore, the city of Natchitoches' sewage sludge operation is presently regulated under this permit.

April 1, 2008: The city of Natchitoches submitted a permit application for the Use or Disposal of Sewage Sludge & Biosolids in Louisiana and a request to terminate/revoke/or void the Solid Waste Beneficial Use Permit.

In accordance with LAC 33:IX.7301.D.1.a.ii that requires the administrative authority to reissue a Louisiana Sewage Sludge and Biosolids Use or Disposal Permit to replace the Standard Solid Waste Permit, P-0359 that was issued to the city of Natchitoches on October 17, 2002.

September 26, 2008: A technical review of the permit application submitted on April 1, 2008 was completed and it was determined that additional information was needed in order to draft a permit package.

The following additional information was deemed necessary prior to the drafting of a permit package:

1. **Specific Facility Information Section – q:** According to the permit application in the **Specific Facility Information Section – o**, the only sewage sludge treatment process is “solidification & de-watering” and subjecting the sewage sludge to a “belt press”. Although this process does change the physical characteristics of the sewage sludge, it does not provide treatment for pollutants, pathogens, and vector attraction reduction. Therefore, the sewage sludge is still considered as “raw, untreated sewage” and the response to “q” needs to be that there is untreated sewage sludge stored at the facility for one (1) month periods. Please make this necessary correction.
2. **Specific Facility Information Section – s:** According to the response to **General Information – d**, the city of Natchitoches Wastewater Plant is a POTW. Therefore, the response of “N/A” provided is incorrect and responses must be provided to all of the questions in **Specific Facility Information Section – s**.
3. **Siting and Operation Section:** Unless the facility described in the permit application is utilized “solely” for the treatment of sewage sludge and the facility is at a location that is not within the confines of the city of Natchitoches Sanitary Wastewater Treatment Plant, the information furnished in this section of the permit application is not needed.
4. **Disposal or Land Application Section:** The response of “N/A” for this section is incorrect. The question and requested information required in this section must be addressed. Therefore, please address the questions and requested information of this Section.
5. **Transportation Section:** The questions and requested information in this section were not addressed. Therefore, please provide the necessary responses to this section.
6. **Appendix Specific Facility Info – BP, S & DW, and Storage:** The schematics/flow-charts provided are unclear as to whether the facility is utilized for the “sole” purpose of the treatment of sewage sludge or if the facility is for the treatment of sanitary wastewater with a separate area for the treatment of sewage sludge that is situated within the premises of the wastewater treatment facility. Therefore, please clarify.

September 26, 2008: A letter was drafted and routed for review requesting that the additional information listed in numbers 1-6 above be submitted to the Department on or before thirty (30) days after receipt of the letter.

September 30, 2008: The Additional Information package was routed for review and signature.

October 02, 2008: The signed Additional Information letter was mailed to the city of Natchitoches.

November 14, 2008: The Water Permits Division received a response from the city of Natchitoches to the Additional Information letter that was mailed to the city of Natchitoches on **October 02, 2008**.

November 19, 2008: The Water Permits Division received some additional information from the city of Natchitoches to the Additional Information letter that was mailed to the city of Natchitoches on **October 02, 2008**.

November 21, 2008: The Water Permits Division completed a technical review of the additional information that was submitted by the city of Natchitoches on **November 14 & 19, 2008**.

December 08, 2008: The Water Permits Division completed the Draft Sewage Sludge & Biosolids Use or Disposal Permit Package for the city of Natchitoches. The Draft Permit contains the following requirements:

A. General

1. This Sewage Sludge and Biosolids Use or Disposal Permit applies only for the preparation of sewage sludge for disposal in a permitted Municipal Solid Waste Landfill (MSWL).
2. The permittee shall prepare the sewage sludge and dispose of the prepared sewage sludge in a permitted Municipal Solid Waste Landfill (MSWL) in accordance with the provisions set forth in this permit and all other applicable State regulations pertaining to the use or disposal of sewage sludge to protect public health and the environment from any reasonably anticipated adverse effects due to any toxic pollutants that may be present in the sewage sludge.
3. Failure to prepare the sewage sludge and properly dispose of the prepared sewage sludge in a permitted Municipal Solid Waste Landfill (MSWL) in accordance with the Act, the Louisiana Administrative Code, the applicable parts of Title 33, Part IX, or this Sewage Sludge and Biosolids Use or Disposal Permit shall constitute a violation which will subject the Permittee to the possible enforcement action including but not limited to the imposition of civil penalties and to the possible suspension or revocation of this Sewage Sludge and Biosolids Use or Disposal Permit.
4. The preparation of sewage sludge and subsequent disposal in a permitted Municipal Solid Waste Landfill (MSWL) through any practice for which requirements have not been established in this Permit will constitute a violation of this Permit.
5. The introduction of sewage sludge that is mixed with grease that was pumped or collected from a Food Service Facility into any part of a treatment works, including its collection system, is prohibited.

B. Preparation Facility

1. Operations and Maintenance Manual

- a. The Facility Operations and Maintenance Manual shall be updated as needed and kept on-site and readily available to employees and, if requested, to the administrative authority or his/her duly authorized representative.

b. The Facility Operations and Maintenance Manual must describe, in specific detail, how the sewage sludge will be managed during all phases of the preparation and subsequent disposal in a permitted Municipal Solid Waste Landfill (MSWL). At a minimum, the manual shall address the following:

- Site and project description;
- Regulatory interfaces;
- Process (preparation) management plan;
- Pollutant reduction in the sewage sludge;
- Control of stormwater run-on and runoff;
- Collection and treatment of all washdown water and leachate;
- Prepared sewage sludge storage procedures;
- Odor management plan;
- Worker health and safety management plan;
- Housekeeping and nuisance management plan;
- Emergency preparedness plan;
- Security, community relations, and public access plan;
- Regulated chemicals (list and location of regulated chemicals kept on-site);
- Monitoring, sampling, recordkeeping, and reporting procedures;
- Product distribution records;
- Description of how the prepared sewage sludge will be collected and transported to the permitted Municipal Solid Waste Landfill (MSWL).
- Operator certification; and
- Administration of the operations and maintenance manual.

2. Operational Standards

a. The facility must include a receiving area, preparing areas, and storage area that are located on surfaces capable of preventing groundwater contamination (periodic inspections of the surface shall be made to ensure that the underlying soils and the surrounding land surface are not being contaminated).

b. All washdown, leachate, and other contaminated wastewater associated with the sewage sludge preparation process shall be collected and transported or piped to the city of Natchitoches POTW Headworks.

c. All sewage sludge preparation areas shall be protected from any stormwater runoff. If necessary, any stormwater and leachate generated at the preparation area shall be collected, transported or piped to the city of Natchitoches POTW Headworks and properly treated prior to any discharge onto the land surface.

d. Provisions shall be made for the daily cleanup of the facility, including equipment and sewage sludge handling areas.

e. Sufficient equipment shall be provided and maintained at the facility to meet operational needs.

3. Odor Management

- a. The production of odor shall be minimized.
- b. Any processed air produced at the facility and other sources of odor shall be contained and, if necessary, properly treated in accordance with an Air Quality Permit in order to remove odor before discharging to the atmosphere.

C. Hazardous Sewage Sludge

1. This Permit does not establish requirements for the use or disposal of sewage sludge that is hazardous under 40 CFR Part 261 and/or LAC 33:Part V.
2. The permittee must take all steps to assure that any material prepared with sewage sludge is non-hazardous in accordance with 40 CFR Part 261 and/or LAC 33:Part V.

D. Sewage Sludge with High PCB Concentration

This Permit does not establish requirements for the use or disposal of sewage sludge with a concentration of polychlorinated biphenyls (PCBs) equal to or greater than 50 milligrams per kilogram of total solids (dry weight basis).

E. Monitoring and Sampling & Analysis

1. The permittee shall sample and analyze representative samples of the prepared sewage sludge for the parameters listed in Table 1 below:

Table 1 Prepared Sewage Sludge (Hazardous Characteristics Testing)	
Parameter	Sampling Frequency
<u>TCLP</u>	Once/Year
Metals (As, Ba, Cd, Cr, Pb, Se, Ag)	
Hg	
Volatile Organics	
Semi-Volatile Organics	
Pesticides	
Herbicides	
PCB (Total)	Once/Year

2. The sewage sludge shall be tested at a frequency required by the Municipal Solid Waste Landfill; however, no less than once/year for the Paint Filter Liquids Test. The Paint Filter Liquids Test shall be performed in accordance with the method 9095 (Paint Filter Liquids Test) as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" (EPA Pub. No. SW-846).
3. Any other sampling and analysis required by the owner/operator of the Municipal Solid Waste Landfill to demonstrate compliance with the Municipal Solid Waste Landfill.
4. All samples and measurements taken for the purpose of laboratory analysis shall be representative of the monitored activity and shall be in accordance with the methods referenced in LAC 33:IX.7301.I.

F. Recordkeeping and Reporting

1. Recordkeeping

- a. The laboratory results for the parameters in Table 1 of this permit and for the Paint Filter Liquids Test shall be retained for the life of the permit.
- b. The permittee shall create and maintain records of monitoring and sampling and analysis information that shall include:
 - the date, exact place, and time of sampling or measurements;
 - the individual(s) who performed the sampling or measurements;
 - the date(s) analyses were performed;
 - the individual(s) who performed the analysis;
 - the analytical techniques or methods used; and,
 - the results of such analysis.

2. Reporting

The permittee shall submit reports to the administrative authority as indicated below:

- a. The amount (tons/yr. on a dry wt. basis) of sewage sludge prepared at the facility shall be reported once per year on the due date indicated in Table 2 below.
- b. The annual amount (tons/yr. on a dry wt. basis) of prepared sewage sludge that is disposed in the permitted Municipal Solid Waste Landfill (MSWL) shall be reported once per year on the due date indicated in Table 2 below.

c. The results of the Paint Filter Liquids Test required in E.2 above, the parameters listed in Table 1 of this permit, and any additional test required by the Municipal Solid Waste Landfill where the sewage sludge is disposed the reporting due date is as indicated in Table 2 below.

Table 2	
Reporting Disposal in a Municipal Solid Waste Landfill	
Monitoring Period (Once per Year)	Report Due Date
January - December	February 28

d. The following certification statements shall be a part of each annual report:

"I certify, under penalty of law, that the information that will be used to determine compliance with the preparation of sewage sludge and ultimate disposal in a permitted Municipal Solid Waste Landfill (MSWL) was prepared under my direction and supervision in accordance with the system as described in the permit application, designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations."

e. The permittee shall report results of the monitoring of the sewage sludge on a form specified by the Administrative Authority.

f. If the permittee monitors any pollutant, in accordance with applicable test procedures specified in this permit, more frequently than required by the permit, then the results of this monitoring shall be reported to the Administrative Authority on the forms specified by the Administrative Authority.

G. Storage of Sewage Sludge

1. The storage of sewage sludge shall not exceed a period of six consecutive months unless notification is submitted to the administrative authority in the form of a demonstration that includes, but is not limited to, the following information:

- a. the name and address of the person who prepared the sewage sludge;
- b. the name and address of the person who either owns or leases the land where the prepared sewage sludge is to be stored, if different from the person who prepared the sewage sludge;
- c. the location, by either street address or latitude and longitude, of the land where the prepared sewage sludge is to be stored;
- d. an explanation of why the prepared sewage sludge needs to remain on the land;

- e. an explanation of why human health and the environment will not be affected by the extended storage of the prepared sewage sludge;
 - f. the approximate date and length of time the prepared sewage sludge will be stored on the land; and
 - g. the final use and disposal method of the prepared sewage sludge after the storage period has expired.
2. The request for an extension for storage for greater than six months must be submitted in writing to the Office of Environmental Services at least 60 days prior to the expiration of the first six-month storage period.
3. The storage period shall not extend for greater than six months until the administrative authority has made and issued a determination to grant or deny the request for the storage of sewage sludge beyond the original six month storage period.

H. Other Requirements for Sewage Sludge Disposed in a Municipal Solid Waste Landfill

1. The Municipal Solid Waste Landfill (MSWL) where the sewage sludge is disposed must possess a permit issued under LAC 33:VII or Subtitle C of the Solid Waste Disposal Act.
2. The permittee shall provide the necessary information to the owner/operator of the landfill where the sewage sludge is disposed to assure that the landfill will be in compliance with its permit requirements.
3. On an annual basis, the permittee shall provide proof to the administrative authority that the sewage sludge is disposed at an approved landfill by furnishing the name, address, and permit number of the landfill to the administrative authority.
4. The permittee shall provide to the administrative authority copies of all records of sampling and laboratory analyses of the sewage sludge that are required by the owner/operator of the Municipal Solid Waste Landfill where the sewage sludge is disposed.

December 09, 2008: The Draft Sewage Sludge & Biosolids Use or Disposal Permit Package was routed for review and signature.

Prepared By: J. Kilren Vidrine, ES-Staff (DCL-A)
Water Permits Division
Biosolids